

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
SOUTHERN DIVISION

EMIL FLUTE, and
PATRICIA FLUTE,

Plaintiffs,

v.

UNITED STATES OF AMERICA,

Defendant.

Civil Action No. 18-4112

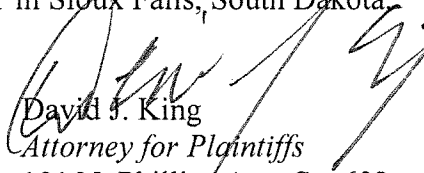
**SECOND DECLARATION OF DAVID
KING IN RESISTANCE TO
DEFENDENTS
MOTION TO DISMISS**

COMES NOW David J. King, and after being first duty sworn and under oath does hereby depose and states as follows:

1. I am one of the attorneys representing the Plaintiffs in the above-captioned matter.
2. Attached as Exhibit "1" is a true and correct copy of the Deposition of Laura Donohue, a nurse at IHS Winnebago Hospital and Clinic taken on May 19, 2021.
3. Attached as Exhibit "2" is a true and correct copy of the Deposition of Sophia Perttula, a nurse at IHS Winnebago Hospital and Clinic taken on May 19, 2021.

Pursuant to the authority of 28 U.S.C. §1746 I declare under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge and belief.

Executed this 11 day of June, 2021 in Sioux Falls, South Dakota.

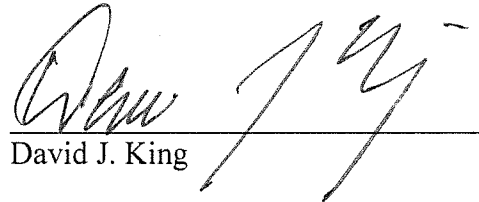

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CERTIFICATE OF SERVICE:

I certify that on this 11 day of June, 2021, a copy hereof has been served to the following via email.

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David J. King